



EDMUND G. ARCHULETA, P.E.

September 4, 2012

Mr. Philip B. Dellinger, Chief  
Ground Water/UIC Section  
Water Quality Protection Division  
U.S. Environmental Protection Agency Region VI  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Re: Use of Proposed Exempt Aquifer

Dear Mr. Dellinger:

El Paso Water Utilities (EPWU) appreciates the opportunity to confirm the lack of future use of the Fusselman Dolomite, Montoya Dolomite, and the El Paso Group (proposed exempt aquifer) as a source of drinking water. As discussed in our application package, the proposed exempt aquifer does not serve as a source of drinking water and there are no water supply wells that penetrate the aquifer in this area.

Future development of the groundwater in the proposed exempt aquifer as a potable supply source is not practical due to its remote location, depth and the brackish condition of the groundwater. Any use of this groundwater would require extensive treatment and disposal of the concentrate generated from its treatment. As such, it is cost prohibitive for EPWU to even consider the proposed exempt aquifer as a potable supply.

El Paso Water Utilities owns over 75,000 acres of water rights land in West Texas. The groundwater contained within these properties has water quality that is far superior to that found in the proposed exempt aquifer. These properties were purchased to provide additional water sources for the City of El Paso beginning in limited amounts no earlier than the year 2040 and perhaps never based on our local options and resources. The timing of implementation of the water importation strategies are presented in the Far West Texas Water Plan 2011 and also in the 2012 Water Plan for the State of Texas. Each of these plans has a 50-year planning cycle.

P.O. BOX 511 • EL PASO, TX 79961-0511 • PHONE: 915-594-5501 • FAX: 915-594-5699

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El Paso Water Utilities provides water on a wholesale basis to Fort Bliss. Due to the poor water quality in the area of the proposed exempted aquifer, the nearby McGregor Range Camp receives all of its water supply from the EPWU system including distribution piping and a pump station. In the event that additional water supply is needed at the range camp, EPWU will expand/augment its existing infrastructure to meet this demand. The proposed exempt aquifer would not be considered as a potential source of water.

In 1995, the Texas Legislature designated the El Paso Water Utilities/ Public Service Board as the Regional Water Supply Planner for El Paso County. As such, EPWU serves a pivotal role in all future planning and expansion projects in El Paso County.

As presented in this letter, EPWU is the regional water supplier and planner for El Paso County including Fort Bliss. There are no plans for the development and use of the proposed exempt aquifer during the life of the project and beyond.

Should you have any additional questions, please do not hesitate to contact me at (915) 594-5501.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ed Archuleta', with a long horizontal flourish extending to the right.

Edmund G. Archuleta, P.E.  
President/Chief Executive Officer